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Cons prot

ANNUAL REPORT

1973-1974

consumer protection

council

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Compagnies et Coopératives

Québec, October 1, 1974

Mr. William Tetley
Minister of Financial Institutions,
Companies and Cooperatives
Parliament Buildings
Québec

Sir,

I have the honor of submitting to you the third annual report of the Consumer Protection Council.

The report outlines the Council's activities for the year ended August 31, 1974.

Raymond Blais

Raymond Blais
Chairman

C O N S U M E R

P R O T E C T I O N

C O U N C I L

1973 - 1974

ANNUAL REPORT

October 1, 1974

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I FOREWORD

Mr. Frank Horton, member of the House of Representatives for New York State and one of the guest speakers at the Consumer Officials National Conference held in Washington in June 1974, stated:

> "I call this the Age of Consumer Participation. Consumers are not trying to run everything; they want to participate to make our free enterprise system more responsive and responsible...". (1)

Throughout his address, Mr. Horton again focused attention upon one of the objectives which, in our opinion, was identical with that pursued by Québec authorities when the Consumer Protection Council was created in July 1971, under the Consumer Protection Act (1971, chap. 74). The Act defines the Council as an advisory body with the following terms of reference:

> "85. The functions of the Council shall be:
>
> (a) to advise and make suggestions to the Minister on any matter he sees fit to submit to it;
>
> (b) to study at the Minister's request any problem respecting the application of this act and to submit reports and suggestions in this respect to the Minister;

(1) Consumerism, Vol. 2, No. 73, June 26, 1974.

(c) to exercise any other advisory function which the Lieutenant-Governor in Council may confer upon it".

At the Council's first meeting, you agreed to extend the scope of its mandate, thus making it possible for the members to study, on their own initiative, any question dealing with consumer protection and to submit to you all suggestions deemed appropriate.

You have always shown great interest in the Council's activities and taken heed of all its suggestions.

However, the Council would like to have its extended terms of reference included in the Act itself.

We want to thank you for the diligence with which you have conveyed to your colleagues the recommendations in our previous reports which concerned sectors under their respective jurisdictions.

This third report of the Council deals with its activities between October 25, 1973, when the present members were appointed, and August 31, 1974, when their term expired.

II THE COUNCIL

(A) Its composition:

Following is the list of those who, under Order in Council Number 3286-73, were appointed members of the Consumer Protection Council for 1973-1974, as well as the names of the organizations to which they belong:

Chairman: Raymond Blais
Lévis
Union régionale de Québec des
Caisses populaires Desjardins

Vice-chairman: Mrs. Cécile Rolland-Bouchard
Chicoutimi
Québec Women's Federation

Members: J. André Bellavance
Rimouski
Québec Chamber of Commerce

Mrs. Gaby Bernard
St. Leonard, Montreal
Cercle des Fermières

Miss Simone Bourgeau, p.s.w.
Montreal
Director of the Service Social de la
Petite Bourgogne

Yvan Cloutier
Amos
Northen Québec A.C.E.F.

Me Ronald Cohen
Montreal
Center for Public Interest Law
Automobile Protection Association (A.P.A.)

Mrs. Nellie Desautels
Sainte-Rosalie
Association féminine d'éducation et d'action sociale (A.F.E.A.S.)

Robert Dickey
Montreal
Publicité-Club

Laval Grondines
Charlesbourg
Québec Teachers' Corporation

Mrs. Hanna Lambek
Montreal
Canadian Consumers Association

Frank Pilon
Montreal
Better Business Bureau of Montreal Inc.

Pierre Pouliot
Québec
Provincial Automobile Dealers Association

Léonard Roy
Montreal
Québec Food Council
Conseil du Patronat du Québec

Jacques Towner
Québec
Conseil de la coopération du Québec
Fédération des Magasins Co-Op

For personal reasons, Laval Grondines resigned before the first meeting and he was not replaced.

The Council suffered a loss with the departure of one of its pioneers and secretary for the past two years,

Me Maurice Marquis. Me Marquis collaborated closely in all of the Council's activities from the very first meeting.

He has been replaced by Me Louis Ladouceur who continues to serve the Council competently and unsparingly.

(B) Its operation:

Ten general meetings were held.

Date of General Meetings	No. of members present
November 21, 1973	13
December 19, 1973	12
January 23, 1974	12
February 27, 1974	12
March 27, 1974	12
April 24, 1974	13
May 29, 1974	12
July 3, 1974	11
July 4, 1974	10
July 24, 1974	10
August 28, 1974	14

Again this year, the Council has set up committees entrusted with special tasks.

The various committees held thirty-two meetings.

The expenses incurred by the Government for both Council and committee meetings amount to $25 223.38.

(C) Its orientation

The role of consultant and advisor to the Minister entrusted to the Consumer Protection Council is comprised of two aspects which are quite distinct in spite of their close relationship.

The first concerns advice offered by the Council on specific questions or problems submitted by the Minister.

The object of the second is to draw the Minister's attention to definite situations by suggesting steps to be taken by the competent authorities to ensure better protection of the consumer's interests.

In both these capacities, the Council must first of all be attentive and observant, capable of perceiving problems and of recognizing the real needs of the consumer , as well as of appreciating the situation as a whole and suggesting measures to remedy any shortcomings.

The varying social, economic and geographic backgrounds of the Council's members guarantee an imposing array of "antennae" and a wide range of knowledge, both of which facilitate the detection of the problems experienced in the various sectors of consumerism.

However, the Council must have the means to go beyond simple detection, so as to be in a position to gauge the extent and effects of these problems accurately.

On the other hand, before suggesting solutions, the members should know what has been done elsewhere in similar cases and the results of the steps taken. It is equally important that the Council be kept informed of the actions and projects of government organizations whose activities affect consumers.

In order to assume such a role effectively, the Council needs the technical support which the Secretariat could provide. The Secretariat should be in a position to play a more active part in this respect. Its personnel should be increased to enable it to prepare and even to make a preliminary analysis of information files for the members of the Council.

III THE COUNCIL'S WORK

(A) Introduction:

Again during the past year, the Consumer Protection Council set up committees to handle special projects.

Certain fields thus assigned are so vast that the committees had to confine themselves to a study of them; these studies, although quite thorough, did not result in definite solutions but rather indicated the need for more specific research.

This will necessitate the setting up of special scientific means with which the Council is not equipped at present.

Other committees have developped specific areas of research, the guidelines for which had already been defined in previous years.

During 1973-1974, the committees carried out studies and research on the following subjects:

1. consumer goods and services
2. the automobile
3. advertising
4. The Law.

The work of these committees made it possible for the Council to adopt a definite position on these topics.

(B) Consumer goods and services

The members of the Committee responsible for this field endeavored to approach all the questions submitted in a comprehensive manner. Needless to say, many of the problems discussed do not fall directly within the scope of the Consumer Protection Act, particularly when this protection is limited

to purchases made by the consumer. It is our opinion that the preoccupations of the Consumer Protection Council must be extended to include the broader needs of the citizen, recognizing the society's obligation to assure his having at least the minimum of goods and services considered necessary to the human condition.

The study undertaken reveals many avenues which are not covered by the Consumer Protection Act. Some even escape the jurisdiction of your Department.

Tentative as they may be, these conclusions indicate once again the need for government to create a body to direct and coordinate the activities of all the consumer protection services which are at present scattered throughout several government departments. This situation makes it difficult to coordinate these various services and too frequently leaves the consumer without recourse.

Examination of the data gathered showed that a considerable portion of the population of Québec falls short of the poverty line.

An attempt was then made to identify the consumer goods and services which can be called essential and to find certain constant factors or common dominators to explain why many current needs constitute a crucial problem for many consumers.

Throughout this study we kept in mind the fact that the steps taken by public and private organizations to solve the consumer's present needs will be effective and significant only to the extent to which they are based on a knowledge of the goods and services previously clearly identified as essential and of prime importance.

We believe that the "essential" nature of goods and services as well as their order of priority must be determined in accordance with the scale of values peculiar to our socio-economic milieu. The following were retained as points of reference:

(a) Civilizations deserving of the name must provide for the harmonious development of every one of its people, families and communities;

(b) To achieve this goal individuals and groups must at least have access to goods and services indispensable to their natural basic needs in order to provide them with a minimum of physical and mental well-being.

On the basis of these considerations, we have identified the goods and services which we consider essential and absolute.

1. Food - because of its influence on the physical and mental health of individuals, the welfare of the family and the vitality of the society in general. We have only to consider the consequences of undernourishment and malnutrition on the behavior of certain groups in society, from the pupil to the worker, for example, school and work attendance, to realize the importance of this factor.

2. Clothing - because of its direct effect on the physical and mental health of the people. Inadequate clothing can prevent people from participating in basic social activities and result in school absenteeism and inability to find or keep a job or to assume social responsibilities in the community.

3. Housing - in a broad sense, this includes heating, electricity, telephone and home sanitary facilities, most of the considerations supporting the priority of food and clothing apply here also.

4. Means of transport - essential in view of the mobility imposed by the socio-economic planning of the territory and by industrial development.

5. Protection of physical and mental health - as regards the various positive aspects of prevention and use of medication; this item includes protection against accidents, propaganda and commercial brainwashing.

6. Recreation - access to green spaces and pure air, especially in highly industrialized and crowded urban areas. To facilitate participation in various activities of a physical, cultural or social nature; to promote, for example, physical exercises and various competitive sports.

7. Communication, education and training - access to factual or objective information which is essential to the intellectual development of the individual and consequently to his ability to choose freely and wisely.

In its second annual report, the Council described the typical consumer. Within the category of consumers described, we believe that the average consumer is one whose income is slightly above the bare minimum required; this allows him a choice in the spending of the amount above the vital minimum without his having in any way, to cut down on the consumption of essential goods and services as regards either their quality or quantity.

RECOMMENDATIONS

On the basis of these various considerations, we recommend that you undertake, or that your colleagues, undertake within their respective fields of authority, extensive research leading to a definite stand which could eventually alleviate present socio-economic difficulties. These studies would deal with:

(A) the possibility of adjusting and indexing the minimum wage to the real rate of increase in the consumer price index;

(B) the possibility of exempting from tax every income below the poverty line;

(C) eventual implementation of a guaranteed income plan;

(D) incentives to the construction, public transport, agricultural and food industries and to sports and recreation organizations with a view to increasing the production of essential goods and services and creating new jobs;

(E) a contribution toward the cleaning up of the environment by eliminating certain physical and human sources of pollution;

(F) the preparation of plans to improve the mental and physical health of the people and of prevention programs of all kinds, such as access to green spaces, organized games and the improvement of eating habits.

(C) The automobile

In its last report the Council made ten recommendations concerning automobiles and motorists. These recommendations were the result of the work done by the Committee charged by the Council of the time with studying the problems peculiar to this field.

This year, this sector is once again the greatest source of complaints: about 14% compared to some 20% submitted to the Bureau last year. In view of the extent of the problem, the Council thought it appropriate to have a committee make a more thorough study of certain points which had already been covered by recommendations in the September 1973 report.

(a) Certification of mechanical conformity

There are several thousand defective vehicles on our roads. They are the cause of many major accidents resulting in serious injuries for their occupants and the occupants of other vehicles on the roads.

The steps taken by the authorities have had a certain beneficial effect but remain far too hesitant and limited.

We therefore propose:

1. That the annual inspection of vehicles registered in Québec be made compulsory as soon as possible. A sticker of the same color as the licence plates should be fixed on the windshield as proof of inspection.

2. That, for inspection purposes, the year be considered as beginning on October 1. This system could be introduced as an optional service and made compulsory the following year.

3. That new vehicles be exempt from such inspection and that the compulsory sticker be affixed by the dealer who would thus assume the responsibility implied.

4. That used vehicles inspected after April 1 of any year, and new vehicles bought after that date, bear the sticker for the following year.

5. That there be a six-month period beginning April 1 and ending October 1 during which motorists may present their vehicles for inspection. This period appears necessary given the number of garages in the province which will be authorized to inspect used vehicles and the number of qualified technicians who will be authorized to carry out the inspection according to the standards set by the Québec Government.

6. That the distribution of inspection stickers be firmly and strictly supervised. The following items should be subject to inspection:

    1. Licence plate light
    2. Front parking lights
    3. Back-up lights
    4. Brake lights
    5. Identification lights
    6. Side lights
    7. High and low beams
    8. Red tail lights
    9. Direction signal lights
    10. Emergency lights
    11. Reflectors
    12. Windshield and windows
    13. Windshield washers
    14. Windshield wipers
    15. Sun visor
    16. Defroster
    17. Rear-view and outside mirrors
    18. Handbrake
    19. Brakes - 4-wheel, brake shoes, brake linings, drums and discs

14. (a)

20. Wheels
21. Tires, including the spare
22. Alignment
23. Shock absorbers

24. Front axle and steering gear
25. Drive shaft
26. Hood - double safety catch
27. Horn
28. Exhaust system
29. Acceleration system and carburetion
30. Gas line - gas tank
31. Condition of the body
32. Body frame
33. Mudguards
34. Seats
35. Seat belts

A study should be made to determine and set the price of such an inspection.

7. That inspections be made by technicians employed in independent garages, who possess the appropriate permit and are authorized to inspect used vehicles.

8. That heavy fines be instituted to act as a deterrent to anyone who is tempted to affix or provide inspection certificates without inspecting the vehicle.

(b) Up dating

Certain automobile manufacturers and dealers have adopted the habit of passing off as current-year models vehicles manufactured prior to the current year.

This practice undoubtedly misleads the consumer and costs him the amount of the depreciation of the vehicle bought.

As a result of this practice, the consumer may also lose the benefit of the safety devices in models manufactured during the current year.

In order to put an end to this practice we propose:

1. That the first two digits of the vehicle identification number be the same as the last two digits of the following year only if the vehicle was manufactured after June 1 of the current year.

2. That it be forbidden to announce or suggest in any way that a vehicle manufactured prior to June 1 of the current year is a new model for the following year.

(c) Compulsory use of seat belts

The documentation studied by the Committee on the use of seat belts clearly shows that in 99% of automobile accidents, seat belts are a definite safety feature.

The negligence of a person who fails to wear his seat belt obviously affects everyone else since it results in increases in the cost of automobile insurance, health insurance and social assistance.

Moreover, courts in Québec and Canada as well as in the United States and Great Britain have declared that a person should wear his seat belt when travelling by car and that some justified claims should thus be decreased by a certain percentage if the claimant was not wearing his seat belt at the time of the accident.

Studies made in the United States showed that each death on the road costs the state an average of $200 000.

On the other hand, 96% of the vehicles manufactured since the 1965 model have two seat belts in the front and the same percentage of vehicles manufactured since the 1969 model have two in the rear. In Canada, seat belts anchored at three points at each end of each of the seats of a vehicle have been compulsory since January 1, 1971.

May we also point out that the use of seat belts has been made compulsory in the following countries: Australia, New Zealand, Czechoslovakia,

France and Porto Rico.

Some twelve American states are in the process of studying the matter. Ohio, for one, has already adopted a pertinent licence plate slogan: "SEAT BELTS FASTENED?"

Great Britain has already spent over $200 million to promote the use of seat belts by British motorists.

It is interesting to note that the Australian experiment in compulsory use of seat belts resulted in a 20% decrease in highway fatalities.

In Canada, 67% of the vehicles on the road are equipped with seat belts anchored at three points. This should facilitate the application of the following recommendations:

- That the installation of seat belts on the front seat be compulsory in all 1965 and subsequent models and that their removal be forbidden.

- That the same requirement be made for rear seat belts for all 1969 and subsequent models.

- That the use of seat belts be obligatory for the driver and any passengers of a vehicle so equipped unless the number of seat belts is insufficient.

- That the following persons be excused from wearing seat belts:

  (a) the driver when backing up;

  (b) any person with a doctor's certificate stating that, for medical reasons, he must not wear a seat belt;

(c) any driver with a medical certificate stating that because of his height, size or other physical characteristic, he cannot safely drive a vehicle while wearing a seat belt;

(d) any passenger with a medical certificate stating that in view of some physical characteristic such as height or size, it would be unreasonable to oblige him to wear a seat belt;

(e) when on the job, any person whose work requires that he get in and out of a vehicle at short intervals and who does not travel at over 15 miles an hour on such a job;

(f) children under nine years of age. However, the driver should be obliged to take the necessary steps to ensure the safety of such children while in his vehicle.

4. That a community education campaign be held to encourage parents and motorists to provide children with car beds and car seats approved by the federal Department of Consumer and Corporate Affairs.

Note: A bibliography of the main documents studied by the members of the Committee responsible for this study can be found in Appendix "A" of the present report.

(d) Odometers:

There is another practice which is prejudicial to consumers and has become so widespread within the past few years that action should be taken without delay, namely, tampering with odometers.

The mileage on a vehicle is an indication for the purchaser of the vehicle's dependability and mechanical condition.

Since these are determining factors in evaluating the vehicle the buyer must be able to rely on the figure appearing on the odometer as a reflection of the true mileage.

The Council recommends that the following steps be taken to give the buyer the protection to which he is entitled.

1. That it be forbidden to advertise, sell, use, install or have installed any device which will adversely affect the operation of the odometer in any way.

2. That it be forbidden to disconnect, replace or modify a vehicle's odometer, or to do anything to change the figure which is or which should be indicated.

3. That it be forbidden to drive or use a vehicle whose odometer is not functioning properly if it seems that the defect is deliberately overlooked to avoid the registering of mileage.

4. That it be forbidden to change the mileage registered when repairing or replacing a defective odometer.

If after repair or replacement, the odometer cannot be made to show the same figure as before, it should be

set at zero and a certificate to this effect affixed to the doorpost of the left front door.

This certificate should give:

(a) the mileage registered before repair or replacement;

(b) the date of the repair or replacement;

(c) the name and address of the person who carried out the work.

Removal of the certificate should be forbidden.

5. That any person who sells his vehicle be obliged to sign a written declaration giving the following information:

(a) the mileage at the time of transfer;

(b) the date of the transfer;

(c) the name and address of the seller;

(d) vehicle identification, comprising the following details: model, body type, serial number and registration number.

This document should be an integral part of the vehicle and be given to any subsequent buyer.

If the seller is aware that the mileage indicated on the odometer is inaccurate, and that the difference is greater than that caused by a simple gauging error, he should declare that he does not know the mileage

6. That the above requirements not hold for a vehicle

   (a) which weighs over 8 tons,

   (b) which is not self-propelled,

   (c) which is over 25 years old.

(D) Advertising

In its second annual report, the Council proposed certain general standards to control advertising and to serve as a guide in drawing up an Advertising Code.

The same report added that:

> "Sectorial provisions are not sufficiently developed and so we are unable to analyse them in detail. We need only to mention that the preparation of an advertising code should first of all include the existing regulations on credit charge advertising, advertising intended for children, as well as advertising pertaining to social allowance and family allowance beneficiaries. It should also contain special regulations in the following areas: food, alcohol, tobacco, medication and drugs, cosmetics and beauty treatments, automobiles, carpets, organized trips as well as premiums, stamps and gifts." (page 36)

This year, along the same lines, the Council created a committee to study advertising used for:

(a) carpets

(b) credit

(c) medication.

(a) Carpets

Introductory note

In this section, unless the context indicates otherwise, the following words have the meaning given below:

(a) Advertising - any publicity for commercial purposes;

(b) Carpets - a product made of textile fibres and intended to be spread on the floor or hung on a wall or door, for instance, either indoors or outdoors;

(c) Wall-to-wall carpet - a carpet intended to permanently cover the entire floor space of a room;

(d) Rug - a carpet of a specific size, with finished edges;

(e) Cushion - a separate item placed between the carpet and the floor;

(f) End of roll - last piece of a roll of carpeting sold at a discount;

(g) Remnants - left-over carpet pieces other than ends of rolls;

(h) Normal price - the approximate average price of the last six months;

(i) Trade name - the name given a specific carpet model by the manufacturer;

Proposed standards

1. Advertisements offering carpets for an entire apartment or house at a set price should be forbidden.

2. Advertisements for wall-to-wall carpeting should include the price per square yard and advertisements for rugs should give the dimensions and total price. If there is a set price for a certain number of square yards, the price of any additional square yards which might be required should also be given.

3. The cost of the carpet, the cushion and the installation should be given separately.

4. No Québec retailer should

   (a) make statements such as "at wholesale price" or "at the manufacturer's price",

   (b) print or distribute any advertisement giving a price or making a comparison of prices which is incorrect or intended to mislead the consumer;

   (c) guarantee the life expectancy of his product;

   (d) compare special sale prices to prices other than the normal price of the same article.

5. In any advertisement or on any carpet or cushion tag, the following should be given:

   (a) the name and address of the manufacturer;

   (b) the trade name of the carpet;

   (c) the generic name of the fibre.

6. A retailer should not imply through his advertising that he is a wholesale manufacturer or distributor.

7. Sketches, illustrations and illustrated trade names should respect the reality of both the merchandise and the prices advertised. When the prices are given with the illustration, the lay-out should be such that there is no possibility of a misunderstanding. Illustrations of premises should actually represent the advertiser's place of business.

8. Advertisements for remnants and ends of rolls should respect the same rules as advertisements for other carpeting; in addition, their dimensions should be indicated.

9. When advertising merchandise which he does not hold in sufficient quantity to supply a reasonable demand, the advertiser should state the exact quantity he has on hand.

10. If the merchandise offered is not available in at least four colors, the colors should be specified in the advertisement unless the advertisement includes the words: "limited number of colors".

11. The only qualifying words which should be used to indicate the absence or presence of factory defects are "perfect" and "imperfect" respectively. Imperfect merchandise should be clearly and conscientiously identified as such. In such cases, any comparison of prices should be between the price of the imperfect carpet and the normal price for a perfect carpet of the same trade name.

12. When a product is to be sold at the advertised price on certain conditions, the conditions should be clearly indicated in the advertisement.

13. Any advertisement for imported carpets should mention the country of origin.

(b) Credit

Division V of the general regulation adopted under the Consumer Protection Act deals with advertising concerning the cost of credit.

The provisions made have doubtless had beneficial effects for consumers but we are of the opinion that this regulation should be reviewed in the light of the following suggestions:

1. No one in Québec should be permitted to prepare, use, publish or have published any advertisement for credit which explicitly or implicitly contains false, biased, unfounded or exaggerated information.

2. No lending institution should encourage a consumer to obtain goods or services other than its own; it could provide information, however, to guide the consumer in purchasing such goods or services.

3. No lending institution should be permitted to exhibit goods other than those it is itself selling.

4. Advertising should not explicitly depict credit as a solution to emotional or psychological problems.

5. Advertising of credit should explicitly mention the obligation to repay capital and interest.

6. Advertising which contains a direct offer of credit should give representative examples of the annual rate and the cost of credit as well as the amount and number of periodic payments to be made to reimburse the credit. This section, however, should not apply to advertisements which simply list and briefly describe certain services offered by a lending institution.

7. Advertisements for credit cards should be subject to the same rules as advertisements for other forms of credit.

8. A merchant advertising the sale or rental of goods or services should not be allowed to encourage potential buyers to obtain credit. No more than a reference to the credit facilities offered by the merchant or accepted by him should be allowed.

9. Nothing in the above rules should prevent a lending institution from collaborating in the development of culture and the arts and in campaigns launched by non-profit-making institutions or from encouraging the purchase of securities issued by the government of Québec or Canada or their official bodies.

(c) Medication

Advertising, intended for consumers of drugs, pharmaceutical specialties or patent medicines should not only be trustworthy and truthful and respect all existing laws but should also be governed by a regulation based on the following rules:

1. Advertisements should not specifically present medications as a solution to emotional or psychological problems.

2. Any representation respecting the effectiveness, safety or rapid effect of a medication should be based on scientific documentation. The manufacturer or merchant distributing such advertisements should produce the documentation upon the request of the Department or a body designated by the Department which could judge of its validity.

3. Comparisons between medications should be forbidden.

4. Personal testimony should be forbidden.

5. Any statement or allusion implying that a health professional recommends or approves the use of a given medication should be forbidden.

6. The following notice should be in plain view on all advertisements:

"ALL MEDICATIONS CAN BE DANGEROUS"

"FOLLOW THE DIRECTIONS CAREFULLY"

(E) The Act

This year again the Council asked a committee to study the Act and attendant regulations in the light of the most pressing consumer needs.

The members of the committee, on the basis of personal observation and available documentation, support certain general objectives towards which, in the Council's opinion, legislation should be oriented in order to guarantee consumers more adequate protection.

First, the Council is of the opinion that existing Québec consumer protection provisions should be consolidated in a single Code. This comprehensive grouping would guarantee more adequate protection by facilitating access to the various sources of information concerning consumer rights as well as the means of exercising them.

Numerous complaints were lodged, mostly by people in the middle income bracket, concerning the sale of immoveables. We are aware of the importance of offering this income group adequate protection, and therefore recommend that sales contracts for immoveable goods be governed by the Consumer Protection Act.

We strongly recommend that this Act apply to contracts between consumers, particularly those dealing with the sale of used cars, mobile homes, pleasure craft, trailers and electrical appliances.

We also request that you continue to urge your colleagues to ensure consumer representation within the various governmental and paragovernmental bodies whose activities are apt to affect consumers' interests. We feel that the consumer should be represented on the same basis as merchants, industrialists and financiers.

In sub-section 2c of section 1 of the Act, the definition of the term "consumer" should read as follows to avoid all possible confusion:

> "Any physical person who is a party to a contract in a capacity other than that of merchant, including a donee or warrantor of that person."

Itinerant Vendors

According to the Act as it now reads, contracts for which the consumer's total obligation does not exceed $25 are exempted from the provisions of Division V. In our opinion, this exemption deprives consumers of proper protection under several types of contracts.

Consequently, we recommend that this division of the Act cover all contracts under which the consumer's obligation exceeds $10, with the exception of the sale of newspaper subscriptions which could continue to be covered above the $25 limit.

Section 54 should be amended to permit consumers wishing to avail themselves of their right of dissolution to send written notices or return the purchased goods either to the itinerant vendor or to his representative with whom they transacted the business.

Similarly, the Act should be amended in order to enable consumers to dissolve contracts made with itinerant vendors within seven days of the date the contract has become executory, or within two days following receipt of the goods under contract, the later of the two being the valid date.

Unsolicited Goods

Consumers who receive unsolicited goods from any merchant should be entitled to require that he take them back, and they should in no way be held legally liable if such goods are not taken back within a reasonable length of time.

Classified Advertisements

Merchants offering any commodity or service for sale through classified advertisements should be required to indicate the fact that they are merchants, their name, address, telephone number and Bureau permit number when they have one.

Civil Sanction

In blatant cases of bad faith on the part of a merchant, the courts should be permitted by law to grant exemplary damages to a consumer who has been wronged and should allow him to recover costs other than legal ones when a decision is rendered in his favor.

Group Action

In a previous report we recommended that the Director of the Bureau be legally entitled to go to law for consumers or consumer groups. As a first step, the Director of the Bureau should be given the right immediately to file such suits on behalf of wronged groups of consumers.

Repair of Durable Goods

It is our recommendation that you explore the possibility of some type of control over the repair of durable goods, particularly automobiles and electrical appliances.

Business Practices

Québec consumers are becoming increasingly vulnerable to victimization by business practices which could be called dishonest, to say the least.

We hereby recommend that the possibility of declaring some of these practices downright illegal be explored.

(F) Other subjects

1. Insurance

The Council is well aware that insurance is a highly complex and technical subject.

Nonetheless, the consumer too often encounters difficulties against which he has practically no defences. We have attempted to investigate in a general way, the problems of the average consumer in this field.

We first observed the ambiguous position of insurance brokers and agents. Are these salesmen employed by one or more insurance companies, and responsible for representing them? Or, do they represent the consumer who wants protection against certain losses?

It is of the utmost importance that the ambivalent status of insurance agents and brokers be clarified.

General Recommendations

1. The examinations and requirements for becoming an insurance agent or broker should be made more stringent.

2. Contracts should be legible and should be written in French, unless the insured person insists that they be drafted in English. They should clearly stipulate the extent of the insured risk as well as any exclusions, so that the consumer will know exactly what he has a right to expect if his claim is in order.

3. All exclusions and restrictions of the risk should be clearly indicated and grouped together under a red sub-title. The full extent of the coverage and all restrictions should be

clearly specified.

4. The rate of credit required for policies sold otherwise than by annual premium should be fully disclosed, in keeping with the regulations under the Consumer Protection Act.

5. Rebates based on the quality of the risks and paid by insurance companies to brokers and agents should be prohibited.

6. In the opinion of the Council, the problem of the many and varied types of insurance policies does not basically lie in the difficulty of comparing different rates, but in identifying the real needs of insured persons.

7. However, the Council is aware of the problem created by the vast number of insurance plans and recommends that the advertising of these numerous plans be regulated.

8. The method of remunerating insurance salesmen should be studied. Agents should be encouraged to choose the type of policy to be sold according to the real needs of the insured rather than the percentage of supplementary remuneration one type of insurance provides as opposed to another.

Life Insurance

1. The Council would favor plans whereby income from life insurance policies is indexed to the cost of living, but is aware that such a change would automatically entail increased rates.

2. The Council recommends that insurance companies be required to reveal clearly whether or not insurance policies are indexed to the cost of living.

3. The Council also recommends that the competent authorities investigate the possibility of requiring insurance companies to index certain types of insurance, as well as the result of such an obligation on rate increases.

4. It is the recommendation of the Council, in order to prevent an insured person from losing acquired potential benefits by pressure on the part of an unscrupulous salesman to have an insurance policy replaced, that the cancellation notice given by the insured person become effective only 30 days after it has been given, during which period the insured person would be able to have the cancelled policy put back into effect with no change in premium or any other terms of the contract.

5. Since insurance companies do not consider it their responsibility to reopen the files periodically with a view to adjusting premium increases resulting from temporary impairment of the health of the insured, it would be advisable to explore the possibility of setting up an office under the jurisdiction of the Superintendent of Insurance to review the increased premiums.

6. The advertising of life insurance policies as well as the techniques used in selling them should be subject to the general regulations under the Consumer Protection Act.

7. The competent authorities should explore the possibility of implementing a life insurance risk assignment plan, and mortality rate tables should be revised every five years.

2. Credit Cards

Credit cards have rapidly come into widespread use in business during the last few years, not just in Québec, but throughout North America. The Québec consumer, credit card in hand, may now buy anything he wishes, from foodstuffs to the most expensive commodities.

It has even been suggested in some places that property taxes be paid in this manner.

The Council does not consider that the use of credit cards can be judged differently, according to whether they are used for purchasing food, liquor, clothing, gas or other goods.

3. The Consumer Protection Bureau

We were pleased to learn that four new regional Bureau offices had been opened and hope this service will soon be available in all the regions of Québec.

"Protect Yourself", a Bureau publication, reveals the energetic manner with which the enforcement of the Act and regulations has been supervised.

These various undertakings are laudable. We would like to be kept informed, however, of the Bureau's major concerns, so that cooperation between the two bodies may be developed to the full.

We are delighted that the first seminar organized by the Consumer Protection Bureau last June was such a success.

Several Council members were pleased to have been given the opportunity to make an active contribution on that occasion.

The manifest interest on the part of the delegates to the seminar is sufficient proof of the importance attached to consumer protection in our society.

Since this one was so successful, we recommend that more such seminars be held.

4. Interprovincial Conferences

We should like to thank you for having acted on one of the recommendations in our last report by inviting Council representatives to the interprovincial conference of ministers responsible for consumer protection and to the meeting of consumer protection legislation administrators.

IV THE FUTURE

The mandate of the Council members is limited to one year, expiring every August 31. For this reason, it is out of the question that the Minister or our successors be required to follow guidelines which do not necessarily fully correspond to the choices and priorities to be established.

Permit us, however, to recommend certain subjects for study by the members of the Consumer Protection Council for the year 1974-75.

Some of these avenues are unexplored, others merely a logical continuation of the Council's past achievements:

1. A GLOBAL "CONSUMER PROTECTION" CONCEPT

No one can deny that Québec consumers need protection. To what extent should their protection be ensured by government bodies? What means could be implemented to guarantee the effective coordination of existing bodies? What rôle should consumer associations play? How can the actions of all these organizations be coordinated?

2. EFFECTIVE REPRESENTATION AND CONSUMER PROTECTION ASSOCIATIONS

In all fairness, it must be stressed that of all the protagonists in the economic field, the "consumer" is the most likely to be represented by groups with few truly democratic ties with the people.

Unfortunately, tiny groups which in fact represent but a handful of individuals and which act in a disorganized fashion, independent of each other, are apt to monopolize the field. These groups try to impose their views, as valid spokesmen for consumers, on other economic agents and State administrative bodies.

This type of study might point up certain criteria of representation for such groups and might ultimately make it possible to take stock of them. This step would reveal any shortcomings which may exist in this area.

3. EDUCATING CONSUMERS

We are still convinced that the most effective protection for the consumer consists in educating him. How may the consumer best be reached?

4. AUTOMOBILE REPAIR

This report contains a number of recommendations on the automobile business and driver safety. In our opinion, these recommendations constitute a logical sequel to previous achievements in this field.

5. PHARMACISTS AND SELF-MEDICATION

We have formulated a number of recommendations with regard to the advertising of drugs.

Under the Professional Code, the office of the professional corporation of Québec pharmacists has published certain draft regulations concerning this profession and drugs.

In our opinion, it would be extremely useful to study these various drafts which have a direct effect on consumers.

6. PRELIMINARY CONCLUSIONS OF THE REPORT ON CONSUMER GOODS AND SERVICES

As we mentioned above, several of the conclusions reached by the Council in this field are only a beginning. They are designed to open up new avenues which we feel are worth exploring.

V RECOMMENDATIONS

This section groups all the recommendations already made in this report.

THE COUNCIL

1. The authorization given us at the outset to study on our own initiative any question dealing with consumer protection and the authorization to submit to you all suggestions deemed appropriate should be incorporated into the text of the Act.

2. The Council should be kept informed of the actions and projects of government organizations whose activities affect consumers.

3. The Secretariat's personnel should be increased to enable it to prepare and even to make a preliminary analysis of information files for the members of the Council.

CONSUMER GOODS AND SERVICES

4. A government body should be created to direct and coordinate the activities of all the consumer protection services which are at present scattered throughout several government departments and bodies.

5. We recommend that you undertake, or ask your colleagues to undertake in their respective competence, research on:

   (A) the possibility of adjusting and indexing the minimum wage to the real rate of increase in the consumer price index;

   (B) the possibility of exempting from tax every income below the poverty line;

   (C) the eventual implementation of a guaranteed income plan;

(D) incentives to the construction, public transport, agricultural and food industries and to sports and recreation organizations with a view to increasing the production of essential goods and services and creating new jobs;

(E) a contribution toward the cleaning up of the environment by eliminating certain physical and human sources of pollution;

(F) the preparation of plans to improve the mental and physical health of the people and of prevention programs of all kinds, such as access to green spaces and to organized games and the improvement of eating habits.

THE AUTOMOBILE

(a) Attestation of mechanical conformity

6. The annual inspection of vehicles registered in Québec should be made compulsory as soon as possible. A sticker of the same color as the licence plates could be fixed on the windshield as proof of inspection.

7. For inspection purposes, the year should be considered as beginning on October 1. This system could be introduced as an optional service and made compulsory the following year.

8. New vehicles should be exempt from such inspection and the compulsory sticker should be affixed by the dealer who would thus assume the responsibility attached.

9. Used vehicles inspected after April 1 of any year and new vehicles bought after that date should bear the sticker for the following year.

10. There should be a six-month period beginning April 1 and ending October 1 during which motorists could present their vehicles for inspection. This period appears necessary given the number of garages in the province which will be authorized to inspect used vehicles and the number of qualified technicians who will be authorized to carry out the inspection according to the standards set by the Québec Government.

11. The distribution of inspection stickers should be firmly and strictly supervised. The following items should be subject to inspection:

1. Licence plate light
2. Front parking lights
3. Back-up lights
4. Brake lights
5. Identification lights
6. Side lights
7. High and low beams
8. Red tail lights
9. Direction signal lights
10. Emergency lights
11. Reflectors
12. Windshield and windows
13. Windshield washers
14. Windshield wipers
15. Sun visor
16. Defroster
17. Rear-view and outside mirrors
18. Handbrake
19. Brakes - 4 wheel, brake shoes, brake linings, drums and discs
20. Wheels
21. Tires, including the spare
22. Alignment
23. Shock absorbers
24. Front axle and steering gear
25. Drive shaft

26. Hood - double safety catch
27. Horn
28. Exhaust system
29. Acceleration system and carburetion
30. Gas line - gas tank
31. Condition of the body
32. Body frame
33. Mudguards
34. Seats
35. Seat belts

12. Inspections should be made by technicians, employed by independent garages, who possess the appropriate permit and who are authorized to inspect used vehicles.

13. Heavy fines should be instituted to act as a deterrent to anyone who is tempted to affix or provide an inspection certificate without inspecting the vehicle.

14. A study should be made to determine and set the price of the required automobile inspection.

(b) New dating system

15. The first two digits of the vehicle identification number should be the same as the last two digits of the following year only if the vehicle was manufactured after June 1 of the current year.

16. It should be forbidden to announce or suggest in any way that a vehicle manufactured prior to June 1 of the current year is a new model for the following year.

(c) Compulsory use of seat belts

17. The installation of seat belts on the front seat should be compulsory in all 1965 and subsequent models and their removal should be forbidden.

18. The same requirement should be made for rear seat belts for all 1969 and subsequent models.

19. The use of seat belts should be obligatory for the driver and any passengers of a vehicle appropriately equipped unless the number of seat belts is insufficient.

20. The following persons should be excused from wearing seat belts:

(a) the driver when backing up;

(b) any person with a doctor's certificate stating that, for medical reasons, he must not wear a seat belt;

(c) any driver with a medical certificate stating that, because of his height, size or other physical characteristics, he cannot safely drive a vehicle while wearing a seat belt;

(d) any passenger with a medical certificate stating that, in view of some physical characteristic such as height or size, it would be unreasonable to oblige him to wear a seat belt;

(e) when on the job, any person whose work requires that he get in and out of a vehicle at short intervals and who does not travel at over 15 miles an hour on such a job;

(f) children under nine years of age. However, the driver should be obliged to take the necessary steps to ensure the safety of such children while in his vehicle.

21. A community education campaign should be organized to encourage parents and motorists to provide children with car beds and car seats approved by the federal Department of Consumer and Corporate Affairs.

(d) Odometers

22. It should be forbidden to advertise, sell, use, install or have installed any device which will adversely affect the operation of the odometer in any way.

23. It should be forbidden to disconnect, replace or modify a vehicle's odometer or to do anything to change the figure which is or which should be indicated.

24. It should be forbidden to drive or use a vehicle whose odometer is not functioning properly if it seems that the defect is deliberately overlooked to avoid the registering of mileage.

25. It should be forbidden to change the mileage registered when repairing or replacing a defective odometer.

If, after repair or replacement, the odometer cannot be made to register the same figure as before, it should be set at zero and a certificate to this effect affixed to the doorpost of the left front door.

26. The certificate attesting to repair or replacement of an odometer should not be removed and should indicate:

(a) the mileage registered before repair or replacement;

(b) the date of the repair or replacement;

(c) the name and address of the person who carried out the work.

27. Any person who sells his vehicle should be obliged to sign a written declaration giving the following information:

(a) the mileage at the time of transfer;

(b) the date of the transfer;

(c) the name and address of the seller;

(d) vehicle identification, comprising the following details: model, body type, serial number and registration number.

This document should be an integral part of the vehicle and be given to any subsequent buyer.

If the seller is aware that the mileage indicated on the odometer is inaccurate, and that the difference is greater than that caused by a simple gauging error, he should declare that he does not know the mileage.

28. The above requirements should not hold for a vehicle:

(a) which weighs over 8 tons;

(b) which is not self-propelled;

(c) which is over 25 years old.

ADVERTISING

(a) Carpets

29. Advertisements offering carpets for an entire apartment or house at a set price should be forbidden.

30. Advertisements for wall-to-wall carpeting should include the price per square yard and advertising of rugs should give the dimensions and total price. If there is a set price for a certain number of square yards, the price of any additional square yards which might be required should also be given.

31. The cost of the carpet, the cushion and the installation should each be given separately.

32. No Québec retailer should

(a) make statements such as "at wholesale price" or "at the manufacturer's price";

(b) print or distribute any advertisement giving a price or making a comparison of prices which is incorrect or intended to mislead the consumer;

(c) guarantee life expectancy;

(d) compare special prices to prices other than the normal price of the article.

33. In any advertisement or on any carpet or cushion tag, the following should be given:

(a) the name and address of the manufacturer;

(b) the trade name of the carpet;

(c) the generic name of the fibre.

34. A retailer should not imply through his advertising that he is a wholesale manufacturer or distributor.

35. Sketches, illustrations and illustrated trade names should respect the reality of both the merchandise and the prices advertised. When the prices are given with the illustration, the lay-out should be such that there is no possibility of a misunderstanding. Illustrations of premises should actually represent the advertiser's place of business.

36. Advertisements for remnants and ends of rolls should respect the same rules as advertisements for other carpeting; in

addition, the dimensions should be indicated.

37. When advertising merchandise which he does not hold in sufficient quantity to fill reasonable order, the advertiser should state the exact quantity he has on hand.

38. If the merchandise offered is not available in at least four colors, the colors should be specified in the advertisement unless the words "limited number of colors" are used.

39. The only qualifying words which should be used to indicate the absence or presence of factory defects are "perfect" and "imperfect" respectively. Imperfect merchandise should be clearly and conscientiously identified as such. In such cases, any comparison of prices should be between the price of the imperfect carpet and the normal price for a perfect carpet of the same trade name.

40. When a product is to be sold at the advertised price on certain conditions, the conditions should be clearly indicated in the advertisement.

41. Any advertisement for imported carpets should mention the country of origin.

(b) Credit

42. No one in Québec should be permitted to prepare, use, publish or have published any advertisement for credit which explicitly or implicitly contains false, biased, unfounded or exaggerated information.

43. No lending institution should encourage a consumer to obtain goods or services other than its own; it could provide information, however, to guide the consumer in purchasing such goods or services.

44. No lending institution should be permitted to exhibit goods other than those it is itself selling.

45. Advertising should not explicitly depict credit as a solution to emotional or psychological problems.

46. Advertising of credit should explicitly mention the obligation to repay capital and interest.

47. Advertising which contains a direct offer of credit should give representative examples of the annual rate and the cost of credit as well as the amount and number of periodic payments to be made to reimburse the credit. However, this should not apply to advertisements which simply list and briefly describe certain services.

48. Advertisements for credit cards should be subject to the same rules as advertisements for other forms of credit.

49. A merchant advertising the sale or rental of goods or services should not be allowed to encourage potential buyers to obtain credit. A simple reference to the credit facilities offered by the merchant or accepted by him could be allowed.

50. Nothing in the above rules should prevent a lending institution from collaborating in the development of culture and the arts and in campaigns launched by non-profit institutions, or from encouraging the purchase of securities issued by the government of Québec or Canada or their official bodies.

(c) Medication

51. Advertisements should not specifically represent medications as a solution to emotional or psychological problems.

52. Any representation respecting the effectiveness, safety or rapid effect of a medication should be based on scientific documentation. The manufacturer or merchant distributing such advertisements should produce the documentation upon the request of the Department or a body designated by the Department which could judge of its validity.

53. Comparisons between medications should be forbidden.

54. Personal testimony should be forbidden.

55. Any statement or allusion implying that a health professional recommends or approves the use of a given medication should be forbidden.

56. The following notice should be in plain view on all advertisements:

"ALL MEDICATION CAN BE DANGEROUS"

"FOLLOW THE DIRECTIONS CAREFULLY"

THE ACT

57. Existing Québec consumer protection provisions should be consolidated in a single Code. This comprehensive grouping would guarantee more adequate consumer protection.

58. Sales contracts for immoveable goods should be governed by the Consumer Protection Act.

59. This Act should apply to contracts between consumers, particularly those dealing with the sale of used cars, mobile homes, pleasure craft, trailers and electrical appliances.

60. We request that you continue to urge your colleagues to

ensure consumer representation within the various governmental and paragovernmental bodies whose activities are apt to affect consumers' interests. We feel consumers should be represented on the same basis as merchants, industrialists and financiers.

61. The definition of the term "consumer" should include the donee and the warrantor.

62. The provisions of Division V of the act respecting contracts made with itinerant vendors should cover all contracts under which the consumer's obligation exceeds $10, with the exception of the sale of newspaper subscriptions which could continue to be covered above the $25 limit.

63. Section 54 should be amended to permit consumers wishing to avail themselves of their right of dissolution to send written notices or return the purchased goods either to the itinerant vendor , or to his representative, with whom they transacted the business.

64. The Act should be amended in order to enable consumers to dissolve contracts made with itinerant vendors within seven days of the date the contract has become executory, or within two days following receipt of the goods under contract, the later of the two being the valid date.

65. Consumers who receive unsolicited goods from any merchant should be entitled to require that he take them back, and they should in no way be held legally liable if such goods are not taken back within a reasonable length of time.

66. Merchants offering any commodity or service for sale through classified advertisements should be required to indicate the fact that they are merchants, their name, address,

telephone number, and Bureau permit number if they have one.

67. In blatant cases of bad faith on the part of a merchant, the courts should be permitted by law to grant exemplary damages to a consumer who has been wronged and should allow him to recover costs other than legal ones when a decision is rendered in his favor.

68. The Act should be modified without delay to empower the Director of the Bureau to institute proceedings on behalf of groups of wronged consumers.

69. We recommend that you explore the possibility of some type of control over the repair of durable goods, particularly automobiles and electrical appliances.

70. We recommend that the possibility be explored of declaring illegal certain dishonest practices of which consumers are victims.

INSURANCE

71. The status of insurance agents and brokers should be established so that the consumer knows whether he is dealing with someone representing his interests or with the employee of an insurance company.

72. The examinations and requirements for becoming an insurance agent or broker should be made more stringent.

73. Contracts should be legible and should be written in French, unless the insured person insists that they be drafted in English. They should clearly stipulate the extent of the insured risk as well as any exclusions, so that the consumer will know exactly what he has a right to expect if his claim is in order.

74. All exclusions and restrictions of the risk should be clearly indicated, grouped together and identified by sub-titles. The full extent of the coverage as well as all restrictions should be clearly specified.

75. The rate of credit required for policies sold otherwise than by annual premium should be fully disclosed, in keeping with the regulations under the Consumer Protection Act.

76. Rebates based on the quality of the risks and paid by insurance companies to brokers and agents should be prohibited.

77. Advertising of the vast number of insurance plans should be regulated.

78. The method of remunerating insurance salesmen should be studied. Agents should be encouraged to choose the type of policy to be sold according to the real needs of the insured rather than the percentage of supplementary remuneration one type of insurance provides as opposed to another.

Life Insurance

79. Insurance companies should be required to reveal clearly whether or not insurance policies are indexed to the cost of living.

80. The competent authorities should investigate the possibility of requiring insurance companies to index certain types of insurance, as well as the result of such an obligation on rate increases.

81. In order to prevent an insured person from losing acquired potential benefits by pressure on the part of an unscrupulous salesman to have an insurance policy replaced, the cancellation notice given by the insured

should become effective only 30 days after it has been given, during which period the insured person would be able to have the cancelled policy put back into effect with no change in premium or in other terms of the contract.

82. It would be advisable to explore the possibility of setting up an office under the jurisdiction of the Superintendent of Insurance to review the increased premiums demanded by insurers of consumers suffering from a temporary disability.

83. The advertising of life insurance policies, as well as the techniques used in selling them, should be subject to the general regulations made under the Consumer Protection Act.

84. The competent authorities should explore the possibility of implementing a life insurance risk assignment plan and mortality rate tables should be revised every five years.

CREDIT CARDS

85. The use of credit cards should not be judged differently according to whether they are used for purchasing food, liquor, clothing, gas or other goods.

SEMINARS

86. The success of the first seminar on consumer protection organized by the Bureau encourages us to recommend that more such meetings be held.

BIBLIOGRAPHY

Anderson, T.E. Shoulder Belt Utilization, Chapel Hill, 1971.

Bohlin, N. A statistical analysis of 28,000 accident cases with emphasis on occupant restraint value, Göteborg.

Campbell B.J. Seat belt use among drivers in accidents and drivers in the population at risk, Chapel Hill, 1969.

Campbell B.J. Seat belt: A pilot study of their use under normal driving conditions, Chapel Hill, 1967.

Cornell Aeronautical Laboratory. Seat belt use and injury patterns in automobile accidents,

Council, F.M. Seat belts: A follow-up study of their use under normal driving conditions, Chapel Hill, 1969.

Haddon, W. Why the issue is loss reduction rather than only class prevention, Washington, 1970.

Levine, D.N. Effectiveness of lap seat belts and the energy absorbing steering system in the reduction of injuries, Chapel Hill, 1971.

Robertson, L.S. Factors Associated with observed seat belt use, Washington, 1972.

South Australia Road Traffic Board, A review of seat belt usage in South Australia, Parkholme, 1972.

Volvo Canada, Safety belts in today's Volvo, Willowdale, 1972.

Waller, Patricia F. Seat belts: A comparison of observed and reported use, Chapel Hill, 1972.

U.S. National Highway Traffic Safety Administration, Multidisciplinary accident investigation summaries, 1968 to date

New York (State) Dept. of Motor Vehicles, Accident facts, Albany, 1972.

Ontario, Ministry of Transportation and Communications, Highway traffic collisions, Toronto, 1971 and 1972

Volvo,	Reports in traffic accident research,	Göteborg, 1973.
Robinson, S.	Observations on fire in automobile accidents,	Buffalo, 1965.
Tourin, B.	Ejection and automobile fatalities,	Buffalo, 1963.